

REMARKS

Reconsideration of the present application, as amended, is respectfully requested. Claims 8, 9, 12-18, 20, 21, 24, 28, and 30-33 have been amended. Claims 1-7 and 34-36 have been canceled based on the prior oral election. Claim 19 has been canceled without prejudice. Claims 37-39 have been added.

Election/Restriction under 35 U.S.C. § 121

Applicants confirm the election made telephonically on April 22, 2002, and elect Group I, claims 8-33, and 37-39. Therefore, claims 1-7 and 34-36 have been canceled without traverse.

Claims 8-10, 12-15, and 17 Rejection under 35 U.S.C. § 103(a)

Examiner rejected claims 8-10, 12-15, 17, and 34-36 under 35 U.S.C. §103(a) as being unpatentable over Kikinis (US Patent No. 5,794,259), hereinafter Kikinis, in view of Lieberman et al. (US Patent No. 6,353,822), hereinafter Lieberman. Applicant respectfully submits that independent claim 8 is not rendered obvious by the combination of Kikinis with Lieberman.

Kikinis teaches a system to automatically fill fields in an Internet form if the field names match those stored on the computer as stated at col. 1, lines 59-67. Kikinis includes use of a "hot key" or key combination to fill in the form (Kikinis, col. 3, lines 58-66.) Thus, Kikinis teaches a plug-in to a web browser. Any client-server interaction information processed by the web browser is stored only on the client computer used to

connect to the web page. Thus, this interaction information cannot be accessed from another computer.

The present invention claims an independent intermediary mechanism (IIM). The IIM is defined in the Detailed Description, for example on page 9, lines 18-20, as a system that "includes both server and client components where the server component handles all remote transactions." Thus, different client computers can connect to the same server component allowing common access to the interaction information. As noted on page 4 of the July 2, 2002 Office Action, the Examiner recognizes that Kikinis fails to teach the IIM element of claim 8.

Lieberman teaches a document retrieval method and apparatus that works "in tandem with a conventional document-retrieval facility, such as a web browser." (Lieberman, Abstract). As in Kikinis, the invention of Lieberman does not operate independently from the web browser. At col. 6, lines 19-30 and in Fig. 2, Lieberman teaches that the search control and preference analysis modules receive state information from the web browser so that the modules can be keyed to the user's browsing behavior. The data originates with the web browser as stated at col. 6, lines 27-30. Lieberman proposes a method for extending document search methods using the existing web browser search methods and is not operable without the web browser. Thus, like Kikinis, Lieberman does not teach or render obvious "connecting to a destination server through an independent intermediary mechanism (IIM)" as disclosed in claim 8 of the presently claimed invention.

The art of Kikinis and Lieberman further solve different problems and, therefore, cannot be logically combined. Kikinis facilitates the filling of forms with saved

information; whereas Lieberman assists in the retrieval of pertinent documents from the Web. Each reference is complete and functional in itself, and there is no reason suggested by the references themselves for the combination made by the Examiner

Furthermore, even in combination the references do not make claim 8 obvious. As discussed above, neither reference teaches or suggests an independent intermediary mechanism. Both references teach devices that add functionality to an existing web browser, and the interaction information remains local to the computer used to connect to the destination server. Thus, the cited references teach away from the concept of an independent intermediary mechanism that is independent of both the client and the destination server. Applicant respectfully submits that independent claim 8 is not rendered obvious by the combination of Kikinis in view of Lieberman.

Claims 9, 10, 12-15, and 17 are dependent on independent claim 8. Applicant respectfully submits that these dependent claims are allowable for at least the reasons discussed above with respect to claim 8.

Claim 11 Rejection under 35 U.S.C. § 103(a)

Examiner rejected claim 11 under 35 U.S.C. §103(a) as being unpatentable over Kikinis, in view of Lieberman, and further in view of Freivald et al. (US Patent No. 5,983,268), hereinafter Freivald. Claim 11 is dependent on independent claim 8. As discussed previously, claim 8 is not rendered obvious by the combination of Kikinis and Lieberman. The combination with Freivald fails to cure the deficiency.

As stated in the Abstract, Freivald is directed to a change detection tool that detects when certain web-page fields change by automatically retrieving the web page

without further user intervention. The user accesses a web page and obtains the Uniform Resource Locator (the URL) using a web browser. (Freivald, col. 4, lines 16-28). The user then registers the URL with the change detection server as stated at col. 4, lines 64-67. The change detection tool then periodically retrieves the web page and compares it to a previously saved version of the web page to determine if changes have been made. (Freivald, col. 5, lines 1-2). The initial connection to the web page and the subsequent connection to the change detection tool are separate functions. There is no connection to the destination server through another element. Rather, the change detection tool connects directly to the server, and the user connects directly to the server, or the user connects directly to the change detection tool. However, none of the elements of Freivald couple a user through an independent intermediary mechanism to a server, as disclosed in the claim 8 element "connecting to a destination server through an independent intermediary mechanism (IIM)."

The change detection tool of Freivald operates independently from the web browser. Conversely, both Kikinis and Lieberman require that the user connect to a web browser. There is no suggestion to combine the teachings of Kikinis, Lieberman, and Freivald.

Further, even in combination, the claim 8 element "connecting to a destination server through an independent intermediary mechanism (IIM)" is not taught by the cited references. Applicant respectfully submits that claim 8 is not rendered obvious by the combination of Kikinis in view of Lieberman and further in view of Freivald. Because claim 11 is dependent on claim 8, Applicant respectfully submits that claim 11 is allowable for at least the reasons discussed above relative to claim 8.

Claim 16 Rejection under 35 U.S.C. § 103(a)

Examiner rejected claim 16 under 35 U.S.C. §103(a) as being unpatentable over Kikinis, in view of Lieberman, and further in view of Morgan et al. (US Patent No. 6,073,140), hereinafter Morgan. Claim 16 is dependent on independent claim 8. As discussed previously, claim 8 is not rendered obvious by the combination of Kikinis and Lieberman. The combination with Morgan fails to cure the deficiency.

As stated in the Abstract, Morgan is directed to a method and system for quickly updating data in a customer database using persistent keys. Morgan teaches use of Open Database Connectivity (ODBC) to perform a direct table join and allow direct data transfer at col. 9, lines 35-42. Morgan does not teach “connecting to a destination server through an independent intermediary mechanism (IIM).” Morgan further does not teach use of a web browser; whereas Kikinis and Lieberman require use of a web browser. For this reason, it would be illogical to combine the cited references, and an inoperative combination would result. Additionally, even if combined, “connecting to a destination server through an independent intermediary mechanism (IIM)” is missing from the references. Applicant respectfully submits that claim 8 is not taught or rendered obvious by the combination of Kikinis in view of Lieberman and further in view of Morgan. Because claim 16 is dependent on claim 8, Applicant respectfully submits that claim 16 is allowable for at least the reasons discussed above relative to claim 8.

Claim 18 Rejection under 35 U.S.C. § 103(a)

Examiner rejected claims 18-19 under 35 U.S.C. §103(a) as being unpatentable over Kikinis in view of Nielsen (US Patent No. 5,963,964), hereinafter Nielsen.

Applicants respectfully submit that independent claim 18 is not rendered obvious by the combination of Kikinis with Nielsen. The Examiner recognizes that Kikinis fails to teach “connecting to a destination server through an independent intermediary mechanism (IIM).” Nielsen fails to cure this deficiency.

As stated in the Abstract, Nielsen is directed to the creation of visual bookmarks that are associated with web pages frequently visited by the user. The visual bookmark is described in relation to textual title bookmarks already included with web browsing applications. (Nielsen, col. 1, lines 12-18). The system taught by Nielsen works as part of an existing web browser. (Nielsen, col. 1, lines 21-26). As in Kikinis and Lieberman, the invention of Nielsen does not operate independently from the web browser. Thus, Nielsen does not teach or render obvious “connecting to a destination server through an independent intermediary mechanism (IIM).” This feature is not rendered obvious because both references teach devices that add functionality to an existing web browser and do not operate independently from the web browser as stated previously relative to claim 8. Thus, the cited references teach away from an independent intermediary mechanism. By not connecting through an IIM that consists of both client and server components, the client-server interaction information cannot be accessed from multiple computers. Applicant respectfully submits that independent claim 18 is not taught or rendered obvious by the combination of Kikinis in view of Nielsen.

Claims 20-33 Rejection under 35 U.S.C. § 103(a)

Examiner rejected claims 20-33 under 35 U.S.C. §103(a) as being unpatentable over Kikinis, in view of Gupta et al. (US Patent No. 6,199,079), hereinafter Gupta.

Applicant respectfully submits that independent claim 20 is not rendered obvious by the combination of Kikinis with Gupta. The Examiner recognizes that Kikinis fails to teach "connecting to a destination server through an independent intermediary mechanism (IIM)." Gupta fails to cure this deficiency.

As stated in the Abstract, Gupta, like Kikinis, is directed to the filling in of forms presented in web pages. Gupta requires use of a web browser which does not contain both client and server components. Gupta does not teach or suggest an independent intermediary mechanism (IIM), which is neither part of the client nor part of the server. As discussed above, Kikinis also does not teach or suggest an IIM. Thus, Applicant respectfully submits that independent claim 20 is not taught or rendered obvious by the combination of Kikinis in view of Gupta.

Claims 21-33 are dependent on independent claim 20. Because claim 20 is not taught or rendered obvious by the combination of Kikinis with Gupta, Applicant respectfully submits that these dependent claims are allowable for at least the reasons discussed above relative to claim 20.

Claims 37-39 have been added and are supported by the Specification, the Figures, and the claims as originally filed. Claims 37-39 include use of an independent intermediary mechanism (IIM) that is not taught or rendered obvious by the cited references for the same reasons advanced above with respect to claim 8, and its

dependent claims. Applicant respectfully submits that claims 37-39 are ready for allowance.


Applicant respectfully submits that in view of the amendments and discussion set forth herein, the applicable rejections have been overcome. Accordingly, the present and amended claims should be found to be in condition for allowance.

If a telephone interview would expedite the prosecution of this application, the Examiner is invited to contact Judith Szepesi at (408) 720-8300.

If there are any additional charges/credits, please charge/credit our deposit account no. 02-2666.

Respectfully submitted,
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10/2/02
Dated



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VERSION WITH MARKINGS TO SHOW CHANGES

IN THE CLAIMS

8. (Once Amended) A method comprising:

[accessing] connecting to a destination server through an independent intermediary mechanism (IIM); [and]

[accessing] connecting to a destination server site including a form;

receiving a request to fill in the form; and

filling in the form from a database in the IIM.

9. (Once Amended) The method of claim 8, wherein [the step of] filling in the form comprises:

determining if the user has a transaction record including the form; and

if the user has a transaction record including the form, filling in the form [from the transaction] using the transaction record in the database.

12. (Once Amended) The method of claim 8, wherein [said step of] filling in the form comprises:

determining if the form is in the [form] database; and

if the form is in the [form] database, filling in the form based on information in the [user profile] database.

13. (Once Amended) The method of claim 12, wherein the [forms] database includes a plurality of forms, such that locations in the form map[ped] into elements in [the] a user profile.

14. (Once Amended) The method of claim 12, wherein the [forms] database comprises multiple databases, at least one of the databases being centrally maintained.

15. (Once Amended) The method of claim 12, further [comprising the step of] comprises adding new forms to the [form] database, wherein [the step of] adding a new form comprises:

- opening a new form at a new address;
- associating form control identifiers in the new form with labels from a user profile [database]; and
- storing the new form, the new address, and the associated form control identifiers in the [forms] database.

16. (Once Amended) The method of claim 12, wherein the [form] database is maintained in a central location, and administered by an authorized updater, such that an IIM updates an internal [form] database from the central location.

17. (Once Amended) The method of claim 8, wherein [the step of] filling in the form comprises:

- determining if the form is in [a transaction] the database,
- if the form is in the [transaction] database, filling in the form based on information in the [transaction] database; and
- [if the form is not in the transaction database, determining if the form is in a form database,
- if the form is in the form database, filling in the form based on information in the form database and in a user profile; and]
- if the form is not in the [form] database, matching entries in [the] a user profile to form control identifiers in the form, and filling in the form based on [the] information from the user profile.

18. (Once Amended) A method comprising:

- connecting to a destination server through an independent intermediary mechanism (IIM); [and]
- receiving an indication to add a universal resource indicator (URI) of the destination server as a bookmark; and

adding the URI as a bookmark in a database in the IIM to allow use by connections through the IIM.

20. (Once Amended) A method comprising:

[accessing] connecting to a destination server through an independent intermediary mechanism (IIM); and

when a user submits a form to the destination server through the IIM,

recording a transaction entry in a [user's transaction] database in the IIM;

and

associating submitted information and the form with the transaction;

wherein the transaction is available for review [to] by the user through the

IIM.

21. (Once Amended) The method of claim 20, further comprising updating a form entry in [a form] the database [in the IIM], based on the form submitted by the user.

24. (Once Amended) The method of claim 20, further [comprising the steps of] comprises:

adding one or more of the date, time, and other information to a transaction record.

28. (Once Amended) The method of claim 20, further comprising when a user [accesses] connects to a destination server including a form,

determining if [a form] the database includes the form; and

if the [form] database includes the form, optionally filling in the data into the form based on [a user profile] information in the database.

30. (Once Amended) The method of claim 28, wherein the [forms] database includes a plurality of forms, such that locations in the form map[ped] into elements in [the] a user profile.

31. (Once Amended) The method of claim 21, further comprising:
adding new forms to the [forms] database by an authorized updater.

32. (Once Amended) The method of claim 31, wherein [the step of] adding new forms comprises:

opening a new form at a new address;

• associating form control identifiers in the new form with labels from a user profile [database]; and

storing the new form, the new address, and the associated form control identifiers in the [forms] database.

33. (Once Amended) The method of claim 31, wherein the [form] database is maintained in a central location, and administered by the authorized updater, such that an IIM updates an internal [form] database from the central location.